

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES

v.

KINGLEY R. CHIN,  
ADITYA HUMAD, and  
SPINEFRONTIER, INC.,  
*Defendants.*

No. 1:21-cr-10256-IT

**DEFENDANTS' MOTION TO PROVISIONALLY SEAL EXHIBIT A  
TO THEIR MOTION FOR LEAVE TO FILE A REPLY IN SUPPORT  
OF THEIR MOTION TO RECONSIDER THAT ASPECT OF THE  
COURT'S MEMORANDUM AND ORDER DATED JULY 3, 2024  
THAT DENIED AN *IN CAMERA* INSPECTION  
OF CERTAIN GRAND JURY TRANSCRIPTS**

Defendants request leave to file provisionally under seal Exhibit A to their Motion for Leave to File a Reply in support of their Motion to Reconsider that Aspect of The Court's Memorandum and Order Dated July 3, 2024 That Denied an *In Camera* Inspection of Certain Grand Jury Transcripts. Exhibit A to the Motion for Leave to File a Reply is Defendants' proposed Reply. If the Motion for Leave to file the Reply is allowed, Defendants also request that provisional sealing apply to the filing of the Reply as well.

Defendants' proposed Reply addresses the government's opposition to the Defendants' motion for partial reconsideration of the Court's July 3, 2024 Memorandum and Order. The government's opposition is currently under seal. Because the proposed Reply (and, if allowed leave to file it, the actual Reply) would address a sealed opposition, Defendants seek in an abundance of caution to seal their proposed Reply (and their Reply, if allowed leave to file it).

Defendants will provide the proposed sealed documents to the Clerk.

Respectfully submitted,

**KINGSLEY CHIN and  
SPINEFRONTIER, INC.**

By their attorneys,

/s/ Joshua L. Solomon

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**ADITYA HUMAD**

By his attorneys,

/s/ William W. Fick

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August 15, 2024

**CERTIFICATE OF SERVICE**

The undersigned certifies that this document, filed on August 15, 2024, through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Joshua L. Solomon